

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,
Plaintiff,

CaseNo.:1:22-cv-1032 (PKC)(JRC)

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI
DECLARATION OF GREGORY ELEFTERAKIS,
ROMAN POLLAK, JONATHON D. WARNER, ESQ.
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,
Defendants.

**Re: Sealing of Defendants' Motion to
Strike (ECF 526)**

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Dear Judge Chen:

I respectfully write to raise a serious concern regarding ECF 526, Defendants' Motion to Strike, filed on July 1, 2025. The docket reflects the submission, but the document is currently sealed in its entirety, without a Court Order or indication that it has been reviewed.

ECF 526 contains critical exculpatory evidence—specifically, email communications involving Adam Rosenblatt, President of Plaintiff IME Watchdog, Inc., which were recovered during the extensive forensic imaging of Defendants' personal devices. These emails were available to Plaintiff's counsel for years and directly contradict Plaintiff's allegations that Defendants coerced or manipulated Mr. Rosenblatt. To the contrary, the communications show he was a proactive and willing participant who initiated much of the conduct now at issue.

Despite having access to these materials through forensic discovery, Plaintiff and its counsel chose to ignore them entirely, preserving only information that supported their claims. The Motion to Strike brings this imbalance to the Court's attention using Rosenblatt's own words and messages. The motion contains no customer lists, no confidential attachments—only relevant emails.

Defendants respectfully request that the Court confirm its review of ECF 526 and clarify the basis for sealing. If the document was administratively restricted or sealed in error, we ask that it be unsealed. Sealing this critical evidence without a judicial ruling while allowing Plaintiff to submit multiple filings unimpeded risks unfairly prejudicing Defendants and undermining due process.

Thank you for your attention to this matter.

*** Filed ***
08:23 AM, 03 Jul, 2025
U.S.D.C., Eastern District of New York
Reid 7/1/25
(8)

Respectfully submitted,
Safa Gelardi
Pro Se Defendant